

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

*Broward County, Florida, v. Purdue  
Pharma L.P., et al.,  
Case No. 18-op-45332*

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**UNOPPOSED MOTION TO DISMISS WALGREENS-BOOTS  
ALLIANCE, INC. AND ADD WALGREEN CO. AS DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 21, Plaintiff in the above-captioned case hereby moves to dismiss Defendant Walgreens-Boots Alliance, Inc. (“WBA, Inc.”) from the case without prejudice and to add Walgreen Co. as Defendant in this case. WBA, Inc. does not oppose the motion.

On June 8, 2018, WBA, Inc. moved to dismiss the complaint in the above-captioned case for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2). If this motion pursuant to Rule 21 to dismiss WBA, Inc. is granted, the motion to dismiss for lack of personal jurisdiction will be moot.

This motion and the addition of Walgreen Co. to this case is without prejudice to any defenses, counterclaims, cross-claims, arguments, or other legal positions available to Walgreen Co. as Defendant in the case.

Date: July 6, 2018.

Respectfully submitted,

By: /s/ Elizabeth J. Cabraser  
LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP  
ELIZABETH J. CABRASER  
MARK P. CHALOS  
PAULINA DO AMARAL  
KENNY S. BYRD  
250 Hudson Street, 8th Floor  
New York, NY 10013  
Tel: 212/355-9500  
ecabraser@lchb.com  
mchalos@lchb.com  
pdoamaral@lchb.com  
kbyrd@lchb.com

By: /s/ Paul J. Geller  
ROBBINS GELLER RUDMAN  
& DOWD LLP  
PAUL J. GELLER  
FL BAR NO. 984795  
MARK J. DEARMAN  
FL BAR NO. 982407  
AELISH M. BAIG  
DOROTHY P. ANTULLIS  
FL BAR NO. 890421  
120 East Palmetto Park Road, Suite 500  
Boca Raton, FL 33432  
Tel: 561/750-3000  
pgeller@rgrdlaw.com  
mdearman@rgrdlaw.com  
abaig@rgrdlaw.com  
dantullis@rgrdlaw.com

By: /s/ James D. Young  
MORGAN & MORGAN COMPLEX  
LITIGATION GROUP  
JAMES D. YOUNG  
FL BAR NO. 567507  
76 South Laura Street  
Suite 1100  
Jacksonville, FL 32202  
Tel: 904/361-0012  
jyoung@forthepeople.com

By: /s/ Robert C. Gilbert  
KOPELOWITZ OSTROW FERGUSON  
WEISELBERG GILBERT  
ROBERT C. GILBERT  
FL BAR NO. 561861  
SCOTT WEISELBERG  
FL BAR NO. 122701  
2800 Ponce de Leon Boulevard, Suite 1100  
Coral Gables, FL 33134  
Tel: 305/384-7269  
gilbert@kolawyers.com  
weiselberg@kolawyers.com

By: /s/ Andrew J. Meyers  
BROWARD COUNTY, FLORIDA  
ANDREW J. MEYERS  
FL BAR NO. 709816  
ANGELA F. BENJAMIN  
FL BAR NO. 015914  
Governmental Center, Suite 423  
115 South Andrews Avenue  
Fort Lauderdale, Florida 33301  
Telephone: 954.357.7600  
Facsimile: 954.357.7641  
ameyers@broward.org  
abenjamin@broward.org

By: /s/ Eugene K. Pettis  
HALICZER PETTIS & SCHWAMM, P.A.  
EUGENE K. PETTIS  
FL BAR NO. 508454  
DEBRA P. KLAUBER  
FL BAR NO. 055646  
One Financial Plaza  
100 SE 3rd Avenue, 7th Floor  
Fort Lauderdale, FL 33394  
Tel: 954/523-9922  
service@hpslegal.com

*Attorneys for Plaintiff  
Broward County, Florida*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 6, 2018, I electronically filed the foregoing document with the Clerk of the United States District Court, Northern District of Ohio. The electronic case filing system (CM/ECF) will send a Notice of Electronic Filing (NEF) to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Robert C. Gilbert

Robert C. Gilbert, Esq.